

Objection Deadline: January 27, 2010  
No Hearing Requested

Sharon Z. Weiss  
RICHARDSON & PATEL LLP  
Murdock Plaza  
10900 Wilshire Boulevard, Suite 500  
Los Angeles, California 90024  
Tel: (310) 208-1182  
Fax: (310) 208-1154

David M. Poitras  
JEFFER, MANGELS, BUTLER &  
MARMARO LLP  
1900 Avenue of the Stars, Seventh Floor  
Los Angeles, California 90067  
Tel: (310) 203-8080  
Fax: (310) 203-0567

*Counsel for Apex Digital, Inc.*

*Counsel for THQ, Inc.*

– and –

Michael St. Patrick Baxter  
Dennis B. Auerbach  
Joshua D. McKarcher (VSB No. 77061)  
COVINGTON & BURLING LLP  
1201 Pennsylvania Avenue NW  
Washington, DC 20004-2401  
Tel: (202) 662-6000  
Fax: (202) 662-6291

*Co-Counsel for Apex Digital, Inc. and THQ, Inc.*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In Re

CIRCUIT CITY STORES, INC., *et al.*,  
Debtors.

Case No. 08-35653 (KRH)

Chapter 11

Jointly Administered

**NOTICE OF MOTION OF APEX DIGITAL, INC. AND THQ, INC. FOR  
RECONSIDERATION OF COURT'S ORDER ON DEBTORS'  
FIFTY-FIRST AND FIFTY-SECOND OMNIBUS OBJECTIONS**

**PLEASE TAKE NOTICE** that on January 13, 2010, parties-in-interest Apex Digital, Inc. and THQ, Inc. filed a Motion for Reconsideration of the Court's *Order on Debtors' Fifty-*

*First and Fifty-Second Omnibus Objections* entered on January 6, 2010 (Docket Number 6228).

Under Local Bankruptcy Rule 9013-1, unless a written response to this motion and supporting memorandum objecting to the relief requested are filed with the Clerk of Court and served on the moving party (and those parties required to be served pursuant to the *Amended Notice, Case Management, and Administrative Procedures* [Docket 6208], available at <http://www.kccllc.net/circuitcity>) within 14 days of the service of this notice, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: January 13, 2010

Sharon Z. Weiss  
RICHARDSON & PATEL LLP  
Murdock Plaza  
10900 Wilshire Boulevard, Suite 500  
Los Angeles, California 90024  
Tel: (310) 208-1182  
Fax: (310) 208-1154

*Counsel for Apex Digital, Inc.*

David M. Poitras  
JEFFER, MANGELS, BUTLER & MARMARO  
LLP  
1900 Avenue of the Stars, Seventh Floor  
Los Angeles, California 90067  
Tel: (310) 203-8080  
Fax: (310) 203-0567

*Counsel for THQ, Inc.*

– and –

/s/ Joshua D. McKarcher

Michael St. Patrick Baxter

Dennis B. Auerbach

Joshua D. McKarcher (VSB No. 77061)

COVINGTON & BURLING LLP

1201 Pennsylvania Avenue, N.W.

Washington, DC 20004-2401

Tel: (202) 662-6000

Fax: (202) 662-6291

*Co-Counsel for Apex Digital, Inc. and THQ, Inc.*